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Counsel for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALFRED DARNELL GREENE and  
CHRISTOPHER SUASAENG, individually, and  
on behalf of all others similarly situated,

Plaintiffs,

vs.

OMNI LIMOUSINE, INC.,

Defendant.

CASE NO.: 2:18-CV-01760-GMN-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFFS' COMPLAINT**

**[SECOND REQUEST]**

The parties, by and through their counsel of record, hereby stipulate and agree as follows:

1. That Defendant's time to answer or otherwise respond to Plaintiffs' Complaint shall be extended up to and including **November 2, 2018**.

2. That the limitations period for the claims of putative collective action members shall be tolled, meaning Defendant will waive the statute of limitations affirmative defense, by a total of 29 days from the date putative collective action members file their consent to join this lawsuit. The 29 days represents the period from the original deadline to respond to Plaintiffs' Complaint through November 2, 2018.

3. This tolling period does not revive any otherwise untimely claims of putative collective action members.

4. This tolling period is expressly conditioned upon the Court allowing the parties the

1 extension requested herein. Should the Court deny the request, the tolling period shall be null and  
2 void and of no effect.

3 This is the second request for an extension of this deadline. It is sought in good faith and  
4 not made for the purposes of delay but to allow counsel sufficient time to marshal the facts relevant  
5 to Plaintiff's collective-action allegations and to respond accordingly.

6 Dated this 19th day of October, 2018.

Dated this 19th day of October, 2018.

7 GARG GOLDEN LAW FIRM

WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN LLP

9 By /s/ Anthony B. Golden

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By /s/ Don Springmeyer

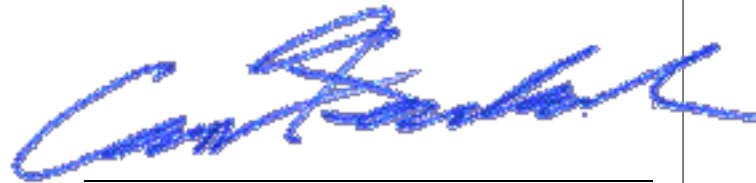
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15 *pending*)  
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16 *Counsel for Plaintiffs*

17  
18 **ORDER**

19 IT IS SO ORDERED.

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22 

23 UNITED STATES MAGISTRATE JUDGE

24 DATE: 10-19-2018  
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